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July 14, 2023

BY ECF

The Honorable Judge Cathy Seibel
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601

The Clerk of Court is respectfully directed to seal ECF Nos.
615 and 618 and their accompanying exhibits.

SO ORDERED.

Re: Sobol, et al. v. Papa John's International, Inc., No. 16-cv-3592-CS


CATHY SEIBEL, U.S.D.J.

Dear Judge Seibel,

7/14/23

Pursuant to the terms of the settlement agreement in the above-captioned case, Plaintiffs sent Defendant Papa John's International, Inc. a draft of the proposed brief in support of Plaintiffs' motion for final approval on July 10. After a conferral process, yesterday afternoon Plaintiffs agreed to remove certain information from the brief. Although I attempted to remove all references to the information from the related filings, due to my oversight, a stray word referring to the information remained in the filed version of paragraph 14 of my declaration in support of final approval (ECF No. 615) as well as in Paragraph 1 of the Proposed Order (which was filed in two separate docket entries). ECF Nos. 615-2, 618-4. This morning my office requested permission from the Court's CM/ECF system to remove ECF Nos. 615 and 618 and all accompanying exhibits from the docket or to seal those documents. The ECF Clerk informed us that an "internal" seal has been placed on those documents and that Your Honor had to order the removal or sealing of those documents.

ECF Nos. 615 and 618 and their accompanying exhibits contain confidential information, were incorrectly filed on the docket, and should be removed from the docket pursuant to ECF Filing Rule 21.7. Corrected versions of those documents have been refiled as ECF No. 624 and ECF No. 625. Plaintiffs therefore respectfully request that the Court either remove ECF Nos. 615 and 618 and their accompanying exhibits from the docket or seal ECF Nos. 615 and 618 and their accompanying exhibits. A proposed order is attached for the Court's convenience. Defendant joins Plaintiffs in making this motion.

I apologize for any inconvenience, and I thank Your Honor for your continued attention to this matter.

Dated: July 14, 2023

Respectfully submitted,

s/ Jeremiah Frei-Pearson
Jeremiah Frei-Pearson
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CC: All Counsel of Record (via ECF)